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Honorable Christopher M. Alston
Chapter 11
Hearing Location: Telephonic
Hearing Date: Friday, June 18, 2021
Hearing Time: 9:30 a.m.
Response Date: June 11, 2021

8 UNITED STATES BANKRUPTCY COURT
9 WESTERN DISTRICT OF WASHINGTON
10 AT SEATTLE

11 In re:
12 NORTHWEST TERRITORIAL MINT, LLC,
13 Debtor.

Case No. 16-11767-CMA

SUPPLEMENTAL DECLARATION OF
MARK CALVERT IN SUPPORT OF
TRUSTEE'S SECOND AND FINAL
APPLICATION FOR
COMPENSATION

14 Mark Calvert declares as follows:

15 1. I am over the age of 18 years old. I submit this supplemental declaration in support
16 of the Trustee's Second and Final Application for Compensation (the "Trustee Application").

17 2. At the June 18, 2021 hearing regarding my Final Fee Application, the Court indicated
18 that it would allow fees of \$137,470 which were described in detail in my Declaration in support of
19 the Trustee's Second and Final Application for Compensation (Dkt. 2300). The Court raised
20 questions regarding my application for estimated fees of \$40,000 for services to conclude the case
21 and directed me to file a supplemental declaration in support of those estimated fees.

22 3. In consideration of the Court's comments at the hearing, I would like to reduce my
23 request for estimated fees through the conclusion of the case. I have provided services to the estate
24 in the last month after the filing of my filed final fee application. These services include providing
25 supporting materials to the Erdmann Trustee in connection with her mediation of her efforts to
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SUPPLEMENTAL DECLARATION OF MARK
CALVERT IN SUPPORT OF TRUSTEE'S SECOND AND
FINAL APPLICATION FOR COMPENSATION - 1
504747966.1

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1 recover funds which will be shared with the Mint estate, attention to plans for the conclusion of the
2 bankruptcy case, filing of a monthly report preparation of materials for and attendance at the final
3 fee application hearing. I have expended 18.7 hours in providing those services to date. The value
4 of those services at my discounted \$400 per hour billing rate is \$7,480. These fees are included in
5 my estimate fees for case closing services. I expect to provide additional services to the estate in
6 support of the Erdmann Trustee litigation, in complying with my obligations to provide discovery
7 and testimony in the Hansen/Erdmann criminal trial, in providing monthly reports to the court, and
8 in coordinating and filing a motion to dismiss the case. I request that the court approve the sum of
9 \$19,000 for estimated fees as compensation for the services I have provided during the past month
10 and through the conclusion of the case.

11
12 I declare under the penalty of perjury under the laws of the United States that the foregoing is
13 true and correct to the best of my knowledge.

14 EXECUTED this 23rd day of June, 2021, at Seattle, Washington.

15
16 /s/ Mark Calvert
17 Mark Calvert
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1 **CERTIFICATE OF SERVICE**

2 The undersigned declares as follows:

3 That she is a paralegal in the law firm of K&L Gates LLP, and on June 23, 2021, she caused
4 the foregoing document to be filed electronically through the CM/ECF system which caused
5 Registered Participants to be served by electronic means, as fully reflected on the Notice of
6 Electronic Filing.

7 I declare under penalty of perjury under the laws of the State of Washington and the United
8 States that the foregoing is true and correct.

9 Executed on the 23rd day of June, 2021 at Seattle, Washington.

10 /s/ Denise A. Lentz
11 Denise A. Lentz
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SUPPLEMENTAL DECLARATION OF MARK
CALVERT IN SUPPORT OF TRUSTEE'S SECOND AND
FINAL APPLICATION FOR COMPENSATION - 3
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